

UNITED STATES DISTRICT COURT FOR  
THE WESTERN DISTRICT OF VIRGINIA  
DANVILLE DIVISION

MOUNTAIN VALLEY PIPELINE, LLC.,

Plaintiff,

v.

EASEMENTS TO CONSTRUCT,  
OPERATE, AND MAINTAIN A  
NATURAL GAS PIPELINE OVER  
TRACTS OF LAND IN PITTSYLVANIA  
COUNTY, VIRGINIA, *et al.*

Case No. 4:21CV00002

Defendants.

**DEFENDANT TRANSCONTINENTAL GAS PIPE LINE COMPANY, LLC'S  
ANSWER TO PLAINTIFF'S COMPLAINT**

COMES NOW Transcontinental Gas Pipe Line Company, LLC ("Transco") and for its Answer to Plaintiff Mountain Valley Pipeline, LLC's ("MVP" or "Plaintiff") Complaint states:

**BACKGROUND**

Transco is a Federal Energy Regulatory Commission ("FERC") regulated interstate natural gas pipeline, and operates under Certificates of Public Convenience and Necessity issued by the FERC. Transco is "natural-gas company" within the meaning of the Natural Gas Act, 15 U.S.C. § 717a(6), and possesses the power of eminent domain. 15 U.S.C. § 717f(h).

Transco operates and maintains multiple, large-diameter pipelines which transport natural gas from Texas, Louisiana, Mississippi and the offshore Gulf of

Mexico area, through Alabama, Georgia, South Carolina, North Carolina, Virginia, Maryland, Pennsylvania, and New Jersey, to its termini in the New York City metropolitan area (Transco's "Mainline System"). Transco's Mainline System consists of some of the most critical energy infrastructure in the United States.

Relevant to this Action, Transco owns various multi-line easements in Pittsylvania County, Virginia, in which it operates and maintains its Mainline System, including blanket easements, defined easements, and exclusive easements (Transco's "Easement Rights"). Through this condemnation proceeding, MVP seeks to take Transco's pre-existing Easement Rights and materially and substantially impair and interfere with Transco's prior public use of its Mainline System. Such a taking is not permitted under the prior public use doctrine, is outside the scope of MVP's Certificate Order, and exceeds what is reasonable and necessary for the construction, operation, and maintenance of MVP's proposed pipeline.

In addition, MVP's filings with the FERC show nearly 50% of its pipeline will be co-located within existing utility corridors and rights-of-way, such as Transco's Easement Rights. Currently, MVP proposes<sup>1</sup> to locate approximately 24.9 miles of pipeline within Transco's existing Easement Rights. This "co-location" is not only impermissible under applicable law, but it also raises significant safety concerns for Transco and the general public. These concerns include, but are not limited to, (1) cathodic protection system interference which, if not properly mitigated and monitored

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<sup>1</sup> The FERC has not yet authorized MVP to commence construction on its Southgate Project.

could cause metal loss in the pipeline resulting in a through-wall pinhole allowing a leak to occur, (2) impediment of access to Transco's Mainline System for operational and safety purposes, (3) reduced cover over Transco's Mainline System, (4) the use of heavy equipment on Transco's Easement Rights which may adversely impact the Mainline System, and (5) blasting operations which could obviously adversely impact the Mainline System.

MVP's proposed location is simply irresponsible. Any failure of MVP to properly construct, manage, operate, and coordinate its activities could cause material damage to Transco's Mainline System, hindering Transco's ability to provide safe, reliable, and critically important service to its customers. For the reasons stated herein, and which will be shown at the trial of this matter, the Court should deny MVP's requested taking of Transco's property rights.

#### ANSWER

1. Transco admits the allegations in Paragraph 1.
2. Transco admits the allegations in Paragraph 2.
3. Transco has insufficient information to admit or deny the allegations in Paragraph 3 and therefore those allegations are denied.
4. Transco has insufficient knowledge to admit or deny the allegations in Paragraph 4 and therefore those allegations are denied.
5. Transco admits the jurisdiction of this Court.
6. Transco admits the allegations in Paragraph 6.
7. Transco admits venue is proper in the Western District of Virginia.

8. Transco admits MVP is a Delaware limited liability company with an office in Canonsburg, Pennsylvania. Transco denies MVP is a "Natural-gas company" as defined by the Natural Gas Act. Transco admits MVP's potential transportation of natural gas in interstate commerce is subject to the jurisdiction of the FERC.

9. Transco admits it owns a fee interest in Pittsylvania County, Virginia Tax Map Parcel 2436-73-3459 by virtue of that certain Deed dated March 4, 1993, recorded in Deed Book 946 at Page 33 in the Clerk's Office of the Circuit Court of Pittsylvania County; and that certain Deed dated November 5, 1956, recorded in Deed Book 370 at Page 502 in the Clerk's Office of the Circuit Court of Pittsylvania County; and that certain Deed dated February 15, 1968, recorded in Deed Book 493 at Page 534 in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and related facilities within the fee area. Based on information currently known by Transco, it does not appear the Permanent Access Road sought by MVP affects Transco's current operations and use of its facilities. However, to the extent the rights sought by MVP over Transco's fee property materially impair or substantially interfere with Transco's prior public use, then Transco objects to MVP's proposed taking. Transco further objects to the extent MVP seeks an exclusive easement over the Permanent Access Road or seeks to exclude Transco from use of the Permanent Access Road, as such a taking exceeds the scope of the Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

10. Transco admits it owns a fee interest in Pittsylvania County, Virginia Tax Map Parcel 2436-72-5208 by virtue of that certain Deed dated December 11, 2012, bearing Instrument No. 12-06902, recorded in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and related facilities within the fee area. Based on information currently known by Transco, it does not appear the Permanent Access Road and Temporary Workspace sought by MVP affects Transco's current operations and use of its facilities. However, to the extent the rights sought by MVP over Transco's fee property materially impair or substantially interfere with Transco's prior public use, then Transco objects to MVP's proposed taking. Transco further objects to the extent MVP seeks an exclusive easement over the Permanent Access Road or seeks to exclude Transco from use of the Permanent Access Road, as such a taking exceeds the scope of the Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

11. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 2436-60-3630 by virtue of that certain Right of Way Agreement dated September 26, 1949, recorded in Deed Book 305, at Page 537, in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the easement area, and has the right to lay additional lines under the easement. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive

Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

12. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 2435-49-7240 by virtue of the following recorded instruments: Right of Way Agreement dated December 14, 1949, recorded in Deed Book 308, at Page 254, in the Clerk's Office of the Circuit Court of Pittsylvania County; Right of Way Agreement dated December 12, 1949, recorded in Deed Book 308, at Page 256, in the Clerk's Office of the Circuit Court of Pittsylvania County; Right of Way Agreement dated December 10, 1949, recorded in Deed Book 308, at Page 258, in the Clerk's Office of the Circuit Court of Pittsylvania County; and Right of Way Agreement dated September 28, 1949, recorded in Deed Book 309, at Page 96, in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the easement area, and has the right to lay additional lines under the easements. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

13. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 2435-38-1783 by virtue of the following recorded instruments: Right of Way Agreement dated December 14, 1949, recorded in Deed Book 308, at Page 254, in the Clerk's Office of the Circuit Court of Pittsylvania County; Right of Way Agreement dated December 12, 1949, recorded in Deed Book 308, at Page 256, in the Clerk's Office of the Circuit Court of Pittsylvania County; Right of Way Agreement dated December 10, 1949, recorded in Deed Book 308, at Page 258, in the Clerk's Office of the Circuit Court of Pittsylvania County; and Right of Way Agreement dated September 28, 1949, recorded in Deed Book 309, at Page 96, in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the easement area, and has the right to lay additional lines under the easements. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

14. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 2435-38-5036, now Tax Map Parcel 2435-38-0701, by virtue of the following recorded instruments: Right of Way Agreement dated December 14, 1949, recorded in Deed Book 308, at Page 254, in the Clerk's Office of the Circuit Court of Pittsylvania

County; Right of Way Agreement dated December 12, 1949, recorded in Deed Book 308, at Page 256, in the Clerk's Office of the Circuit Court of Pittsylvania County; Right of Way Agreement dated December 10, 1949, recorded in Deed Book 308, at Page 258, in the Clerk's Office of the Circuit Court of Pittsylvania County; Right of Way Agreement dated September 15, 1953, recorded in Deed Book 346, at Page 583, in the Clerk's Office of the Circuit Court of Pittsylvania County; and Right of Way Agreement dated September 28, 1949, recorded in Deed Book 309, at Page 96, in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the easement area, and has the right to lay additional lines under the easements. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

15. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 2435-28-9138 by virtue of the following recorded instruments: Right of Way Agreement dated December 14, 1949, recorded in Deed Book 308, at Page 254, in the Clerk's Office of the Circuit Court of Pittsylvania County; Right of Way Agreement dated December 12, 1949, recorded in Deed Book 308, at Page 256, in the Clerk's Office of the Circuit Court of Pittsylvania County; Right of Way Agreement dated December

10, 1949, recorded in Deed Book 308, at Page 258, in the Clerk's Office of the Circuit Court of Pittsylvania County; Right of Way Agreement dated September 15, 1953, recorded in Deed Book 346, at Page 583, in the Clerk's Office of the Circuit Court of Pittsylvania County; and Right of Way Agreement dated September 28, 1949, recorded in Deed Book 309, at Page 96, in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the easement area, and has the right to lay additional lines under the easements. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

16. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 2435-27-0254 by virtue of the following recorded instruments: Right of Way Agreement dated September 26, 1949, recorded in Deed Book 305, at Page 535, in the Clerk's Office of the Circuit Court of Pittsylvania County; and Right of Way Agreement dated December 13, 1949, recorded in Deed Book 308, at Page 250, in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the easement area, and has the right to lay additional lines under the easements. In addition to the objections and

defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

17. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 2435-06-9728 by virtue of the following recorded instruments: Right of Way Agreement dated September 26, 1949, recorded in Deed Book 305, at Page 535, in the Clerk's Office of the Circuit Court of Pittsylvania County; and Right of Way Agreement dated December 13, 1949, recorded in Deed Book 308, at Page 250, in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the easement area, and has the right to lay additional lines under the easements. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

18. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 2425-95-1974 by virtue of that certain Right of Way Agreement dated

September 24, 1949, recorded in Deed Book 305, at Page 533, in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the easement area, and has the right to lay additional lines under the easement. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

19. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 2425-92-1329 by virtue of the following recorded instruments: Right of Way Agreement dated September 24, 1949, recorded in Deed Book 306, at Page 59, in the Clerk's Office of the Circuit Court of Pittsylvania County; and Right of Way Agreement dated December 13, 1949, recorded in Deed Book 308, at Page 132, in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the easement area, and has the right to lay additional lines under the easements. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate

Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

20. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 2425-71-4250 by virtue of the following recorded instruments: Right of Way Agreement dated October 4, 1949, recorded in Deed Book 308, at Page 248, in the Clerk's Office of the Circuit Court of Pittsylvania County; and Right of Way Agreement dated December 16, 1949, recorded in Deed Book 308, at Page 247, in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the easement area, and has the right to lay additional lines under the easements. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

21. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 2425-51-5492 by virtue of the following recorded instruments: Right of Way Agreement dated October 4, 1949, recorded in Deed Book 308, at Page 248, in the Clerk's Office of the Circuit Court of Pittsylvania County; and Right of Way Agreement dated December 16, 1949, recorded in Deed Book 308, at Page 247, in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains

natural gas pipelines and appurtenant facilities within the easement area, and has the right to lay additional lines under the easements. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

22. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 2425-71-4250 by virtue of the following recorded instruments: Right of Way Agreement dated October 4, 1949, recorded in Deed Book 308, at Page 248, in the Clerk's Office of the Circuit Court of Pittsylvania County; and Right of Way Agreement dated December 16, 1949, recorded in Deed Book 308, at Page 247, in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the easement area, and has the right to lay additional lines under the easements. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

23. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 2424-59-7932 virtue of that certain Right of Way Agreement dated September 21, 1949, recorded in Deed Book 306, at Page 57, in the Clerk's Office of the Circuit Court of Pittsylvania County, under which Transco has the right to lay additional pipelines within the easement area. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds MVP's proposed taking exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

24. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 2424-59-5941 by virtue of that certain Right of Way Agreement dated September 21, 1949, recorded in Deed Book 306, at Page 57, in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the easement area, and has the right to lay additional lines under the easement. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

25. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 2424-57-4798 by virtue of that certain Right of Way Agreement dated

September 21, 1949, recorded in Deed Book 306, at Page 57, in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the easement area, and has the right to lay additional lines under the easement. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

26. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 2424-48-2850 by virtue of that certain Right of Way Agreement dated September 26, 1949, recorded in Deed Book 305, at Page 531, in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the easement area, and has the right to lay additional lines under the easement. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

27. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 2424-37-2306 by virtue of that certain Right of Way Agreement dated September 22, 1949, recorded in Deed Book 305, at Page 529, in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the easement area, and has the right to lay additional lines under the easement. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

28. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 2424-35-7169 by virtue of the following recorded instruments: Right of Way Agreement dated October 18, 1949, recorded in Deed Book 307, at Page 88, in the Clerk's Office of the Circuit Court of Pittsylvania County; Right of Way Agreement dated October 18, 1949, recorded in Deed Book 307, at Page 86, in the Clerk's Office of the Circuit Court of Pittsylvania County; Right of Way Agreement dated December 9, 1949, recorded in Deed Book 308, at Page 130, in the Clerk's Office of the Circuit Court of Pittsylvania County; and Right of Way Agreement dated December 9, 1949, recorded in Deed Book 308, at Page 128, in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and

appurtenant facilities within the easement area, and has the right to lay additional lines under the easements. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

29. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 2424-15-8616 by virtue of the following recorded instruments: Right of Way Agreement dated October 18, 1949, recorded in Deed Book 307, at Page 88, in the Clerk's Office of the Circuit Court of Pittsylvania County; Right of Way Agreement dated October 18, 1949, recorded in Deed Book 307, at Page 86, in the Clerk's Office of the Circuit Court of Pittsylvania County; Right of Way Agreement dated December 9, 1949, recorded in Deed Book 308, at Page 130, in the Clerk's Office of the Circuit Court of Pittsylvania County; and Right of Way Agreement dated December 9, 1949, recorded in Deed Book 308, at Page 128, in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the easement area which is to the north of the property at issue in Paragraph 29; however, Transco has the right to lay additional lines under the easements. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking to the extent it will materially impair and substantially interfere

with Transco's prior public use or deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

30. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 2424-15-3531 by virtue of that certain Right of Way Agreement dated September 22, 1949, recorded in Deed Book 305, at Page 527, in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the easement area, and has the right to lay additional lines under the easement. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

31. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 2424-04-1919 by virtue of that certain Right of Way Agreement dated November 7, 1949, recorded in Deed Book 307, at Page 354, in the Clerk's Office of the Circuit Court of Pittsylvania County, and as amended by the Amendment to Right of Way Agreement dated April 27, 2007, bearing Instrument No. 09-01628 as recorded in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently

operates and maintains natural gas pipelines and appurtenant facilities within the easement area, and has the right to lay additional lines under the easement. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

32. Transco has insufficient information to determine whether it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 2424-04-9040.

33. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 2414-91-2286 by virtue of the following recorded instruments: Right of Way Agreement dated November 8, 1949, recorded in Deed Book 307, at Page 275, in the Clerk's Office of the Circuit Court of Pittsylvania County; Right of Way Agreement dated February 21, 1950, recorded in Deed Book 310, at Page 468, in the Clerk's Office of the Circuit Court of Pittsylvania County; Right of Way Agreement dated March 11, 1950, recorded in Deed Book 311, at Page 267, in the Clerk's Office of the Circuit Court of Pittsylvania County; and Right of Way Agreement dated March 15, 1950, recorded in Deed Book 311, at Page 265, in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the easement area, and has the right to lay additional lines under the easements. In addition to the objections and defenses listed below, Transco

objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

34. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 2414-70-4055 by virtue of that certain Right of Way Agreement dated September 26, 1949, recorded in Deed Book 305, at Page 525, in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the easement area, and has the right to lay additional lines under the easement. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

35. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 2413-59-6730 by virtue of the following recorded instruments: Right of Way Agreement dated September 23, 1949, recorded in Deed Book 305, at Page 522, in the Clerk's Office of the Circuit Court of Pittsylvania County; and Right of Way Agreement

dated September 22, 1949, recorded in Deed Book 305, at Page 523, in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the easement area, and has the right to lay additional lines under the easements. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

36. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 2413-47-1490 by virtue of that certain Right of Way Agreement dated October 20, 1949, recorded in Deed Book 307, at Page 85, in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the easement area, and has the right to lay additional lines under the easement. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

37. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 2413-26-9373 by virtue of that certain Right of Way Agreement dated September 22, 1949, recorded in Deed Book 305, at Page 520, in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the easement area, and has the right to lay additional lines under the easement. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

38. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 2413-25-7197 by virtue of that certain Right of Way Agreement dated September 22, 1949, recorded in Deed Book 305, at Page 518, in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the easement area, and has the right to lay additional lines under the easement. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order

and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

39. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 2413-24-0281 by virtue of that certain Right of Way Agreement dated September 22, 1949, recorded in Deed Book 306, at Page 56, in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the easement area, and has the right to lay additional lines under the easement. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

40. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 2413-24-0281 by virtue of that certain Right of Way Agreement dated September 22, 1949, recorded in Deed Book 306, at Page 56, in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the easement area, and has the right to lay additional lines under the easement. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive

Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

41. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 2413-13-9323 by virtue of the following recorded instruments: Right of Way Agreement dated September 24, 1949, recorded in Deed Book 305, at Page 285, in the Clerk's Office of the Circuit Court of Pittsylvania County; and Exclusive Easement Agreement dated February 23, 2007, bearing Instrument No. 07-05297 recorded in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the easement area, and has the right to lay additional lines under the easements. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

42. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 2413-02-0411 by virtue of that certain Right of Way Agreement dated September 24, 1949, recorded in Deed Book 305, at Page 285, in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural

gas pipelines and appurtenant facilities within the easement area, and has the right to lay additional lines under the easement. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

43. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 2403-90-5329 by virtue of that certain Right of Way Agreement dated September 27, 1949, recorded in Deed Book 305, at Page 283, in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the easement area, and has the right to lay additional lines under the easement. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

44. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 2403-90-0325 by virtue of that certain Right of Way Agreement dated

September 27, 1949, recorded in Deed Book 305, at Page 283, in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the easement area, and has the right to lay additional lines under the easement. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

45. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 2403-71-4078 by virtue of that certain Right of Way Agreement dated September 27, 1949, recorded in Deed Book 305, at Page 283, in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the easement area, and has the right to lay additional lines under the easement. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

46. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 2402-98-0934 by virtue of that certain Right of Way Agreement dated September 27, 1949, recorded in Deed Book 305, at Page 282, in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the easement area, and has the right to lay additional lines under the easement. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

47. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 2402-78-3404 by virtue of that certain Right of Way Agreement dated October 25, 1949, recorded in Deed Book 307, at Page 83, in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the easement area, and has the right to lay additional lines under the easement. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order

and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

48. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 2402-77-0019 by virtue of that certain Right of Way Agreement dated October 20, 1949, recorded in Deed Book 307, at Page 82, in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the easement area, and has the right to lay additional lines under the easement. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

49. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 2402-65-2646 by virtue of the following recorded instrument: Right of Way Agreement dated October 21, 1949, recorded in Deed Book 307, at Page 273, in the Clerk's Office of the Circuit Court of Pittsylvania County; and Exclusive Easement dated July 1, 1980, recorded in Deed Book 686, at Page 139, in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the easement area, and has the right to lay additional lines under the easements. In addition to the objections and defenses

listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

50. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 2402-57-2108 by virtue of that certain Right of Way Agreement dated October 21, 1949, recorded in Deed Book 307, at Page 273, in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the easement area, and has the right to lay additional lines under the easement. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

51. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 2402-33-9883 by virtue of that certain Right of Way Agreement dated September 26, 1949, recorded in Deed Book 305, at Page 280, in the Clerk's Office of the Circuit Court of Pittsylvania County, as amended by Amendment to Right of Way

Agreement dated July 3, 2007, bearing Instrument No. 07-05900 as recorded in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the defined easement area, and has the right to lay additional lines under the easement. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

52. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 2402-41-1695 by virtue of that certain Right of Way Agreement dated November 18, 1949, recorded in Deed Book 307, at Page 158, in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the easement area, and has the right to lay additional lines under the easement. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

53. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 2402-14-7646 by virtue of that certain Right of Way Agreement dated November 1, 1949, recorded in Deed Book 307, at Page 271, in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the easement area, and has the right to lay additional lines under the easement. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

54. Transco has insufficient information to determine whether it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 2402-22-0084.

55. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 2402-12-8051 by virtue of the following recorded instruments: Right of Way Agreement dated September 26, 1949, recorded in Deed Book 306, at Page 595, in the Clerk's Office of the Circuit Court of Pittsylvania County; Right of Way Agreement dated December 1, 1949, recorded in Deed Book 307, at Page 352, in the Clerk's Office of the Circuit Court of Pittsylvania County; and Right of Way Agreement dated December 7, 1949, recorded in Deed Book 307, at Page 421, in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas

pipelines and appurtenant facilities within the easement area, and has the right to lay additional lines under the easements. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

56. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 2402-11-6493 by virtue of that certain Right of Way Agreement dated April 8, 1950, recorded in Deed Book 312, at Page 449, in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the easement area, and has the right to lay additional lines under the easement. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

57. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 2402-11-2650 by virtue of the following recorded instruments: Order

Confirming Commissioners' Report dated May 22, 1950, recorded in Deed Book 312, at Page 500, in the Clerk's Office of the Circuit Court of Pittsylvania County; Right of Way Agreement dated May 27, 1957, recorded in Deed Book 375, at Page 363, in the Clerk's Office of the Circuit Court of Pittsylvania County; Right of Way Agreement dated June 28, 1962, recorded in Deed Book 421, at Page 401, in the Clerk's Office of the Circuit Court of Pittsylvania County; and Supplemental Right of Way Agreement dated March 28, 2007, bearing Instrument No. 07-02748 as recorded in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the defined easement area. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

58. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 2402-11-2352 by virtue of the following recorded instruments: Order Confirming Commissioners' Report dated May 22, 1950, recorded in Deed Book 312, at Page 500, in the Clerk's Office of the Circuit Court of Pittsylvania County; Right of Way Agreement dated May 27, 1957, recorded in Deed Book 375, at Page 363, in the Clerk's Office of the Circuit Court of Pittsylvania County; Right of Way Agreement dated June 28, 1962, recorded in Deed Book 421, at Page 401, in the Clerk's Office of the Circuit

Court of Pittsylvania County; and Supplemental Right of Way Agreement dated March 28, 2007, bearing Instrument No. 07-02748 as recorded in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the defined easement area. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

59. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 2402-00-7999 by virtue of the following recorded instruments: Order Confirming Commissioners' Report dated May 22, 1950, recorded in Deed Book 312, at Page 500, in the Clerk's Office of the Circuit Court of Pittsylvania County; Right of Way Agreement dated May 27, 1957, recorded in Deed Book 375, at Page 363, in the Clerk's Office of the Circuit Court of Pittsylvania County; Right of Way Agreement dated June 28, 1962, recorded in Deed Book 421, at Page 401, in the Clerk's Office of the Circuit Court of Pittsylvania County; and Supplemental Right of Way Agreement dated March 28, 2007, bearing Instrument No. 07-02748 as recorded in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the defined easement area. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on

the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

60. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 1491-88-2609 by virtue of the following recorded instruments: Order Confirming Commissioners' Report dated May 22, 1950, recorded in Deed Book 312, at Page 504, in the Clerk's Office of the Circuit Court of Pittsylvania County; Right of Way Agreement dated May 27, 1957, recorded in Deed Book 375, at Page 388, in the Clerk's Office of the Circuit Court of Pittsylvania County; Right of Way Agreement dated June 28, 1962, recorded in Deed Book 421, at Page 406, in the Clerk's Office of the Circuit Court of Pittsylvania County; and Supplemental Right of Way Agreement dated April 18, 2007, bearing Instrument No. 07-03384 as recorded in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the defined easement area. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

61. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 1491-86-3788 by virtue of that certain Right of Way Agreement dated October 3, 1949, recorded in Deed Book 306, at Page 54, in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the easement area, and has the right to lay additional lines under the easement. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

62. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 1491-65-7149 by virtue of the following recorded instruments: Right of Way Agreement dated November 28, 1949, recorded in Deed Book 307, at Page 270, in the Clerk's Office of the Circuit Court of Pittsylvania County; and Right of Way Agreement dated September 23, 1949, recorded in Deed Book 305, at Page 517, in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the easement area, and has the right to lay additional lines under the easements. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will

deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

63. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 1491-91-0504 by virtue of the following recorded instruments: Order Confirming Commissioners' Report dated May 22, 1950, recorded in Deed Book 312, at Page 504, in the Clerk's Office of the Circuit Court of Pittsylvania County; Right of Way Agreement dated May 27, 1957, recorded in Deed Book 375, at Page 388, in the Clerk's Office of the Circuit Court of Pittsylvania County; Right of Way Agreement dated June 28, 1962, recorded in Deed Book 421, at Page 406, in the Clerk's Office of the Circuit Court of Pittsylvania County; and Supplemental Right of Way Agreement dated April 18, 2007, bearing Instrument No. 07-03384 as recorded in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the defined easement area. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

64. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 1491-62-4268 by virtue of that certain Right of Way Agreement dated September 23, 1949, recorded in Deed Book 305, at Page 279, in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the easement area, and has the right to lay additional lines under the easement. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

65. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 1491-62-0493 by virtue of the following recorded instruments: Right of Way Agreement dated September 23, 1949, recorded in Deed Book 305, at Page 277, in the Clerk's Office of the Circuit Court of Pittsylvania County; Exclusive Easement Agreement dated April 6, 2007, bearing Instrument No. 07-03379 recorded in the Clerk's Office of the Circuit Court of Pittsylvania County; and Option to Purchase Supplemental Easement and Right-of-Way dated June 15, 2018, bearing Instrument No. 18-03597 recorded in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the easement area, and has the right to lay additional lines under the

easements. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

66. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 1491-21-6183 by virtue of the following recorded instruments: Right of Way Agreement dated October 21, 1949, recorded in Deed Book 307, at Page 77, in the Clerk's Office of the Circuit Court of Pittsylvania County; Right of Way Agreement dated April 10, 1980, recorded in Deed Book 688, at Page 407, in the Clerk's Office of the Circuit Court of Pittsylvania County; and Option to Purchase Supplemental Easement and Right-of-Way dated May 29, 2018, bearing Instrument No. 18-03596. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the defined easement area, and has the right to lay additional lines under the easements. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is

reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

67. Transco has insufficient information to determine whether it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 1490-39-3607.

68. Transco has insufficient information to determine whether it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 1490-29-6396.

69. Transco has insufficient information to determine whether it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 1490-28-7861.

70. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 1490-28-2154 by virtue of the following record instruments: Right of Way Agreement dated October 3, 1949, recorded in Deed Book 306, at Page 52, in the Clerk's Office of the Circuit Court of Pittsylvania County; and Option to Purchase Supplemental Easement and Right-of-Way dated May 30, 2018, bearing Instrument No. 18-03594, recorded in the Clerk's Office of the Circuit Court of Pittsylvania County.. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the easement area, and has the right to lay additional lines under the easement. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is

reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

71. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 1490-08-8470 by virtue of the following recorded instruments: Right of Way Agreement dated October 20, 1949, recorded in Deed Book 307, at Page 7, in the Clerk's Office of the Circuit Court of Pittsylvania County; Right of Way Agreement dated December 10, 1957, recorded in Deed Book 378, at Page 392, in the Clerk's Office of the Circuit Court of Pittsylvania County; and Right of Way Agreement dated October 21, 1949, recorded in Deed Book 307, at Page 75, in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the easement area, and has the right to lay additional lines under the easements. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

72. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 1480-97-7043 by virtue of the following recorded instruments: Right of Way Agreement dated September 29, 1949, recorded in Deed Book 305, at Page 276, in the Clerk's Office of the Circuit Court of Pittsylvania County; and Cathodic Protection

Easement dated March 12, 2002, recorded in Deed Book 1304, at Page 7, in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the easement area, and has the right to lay additional lines under the easements. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

73. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 1480-85-7583 by virtue of that certain Right of Way Agreement dated November 29, 1949, recorded in Deed Book 307, at Page 351, in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the easement area, and has the right to lay additional lines under the easement. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

74. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 1480-74-4175 by virtue of that certain Right of Way Agreement dated November 29, 1949, recorded in Deed Book 307, at Page 351, in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the easement area, and has the right to lay additional lines under the easement. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

75. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 1480-74-9292 by virtue of that certain Right of Way Agreement dated November 29, 1949, recorded in Deed Book 307, at Page 351, in the Clerk's Office of the Circuit Court of Pittsylvania County. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking to the extent it will materially impair and substantially interfere with Transco's prior public use or deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

76. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 1480-52-6445 by virtue of the following recorded instruments: Right of Way Agreement dated October 26, 1949, recorded in Deed Book 307, at Page 350, in the Clerk's Office of the Circuit Court of Pittsylvania County; Right of Way Agreement dated November 23, 1949, recorded in Deed Book 307, at Page 348, in the Clerk's Office of the Circuit Court of Pittsylvania County; Right of Way Agreement dated August 13, 1951, recorded in Deed Book 330, at Page 542, in the Clerk's Office of the Circuit Court of Pittsylvania County; and Amendment to Right of Way Agreement dated September 28, 1987, recorded in Deed Book 824, at Page 597, in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the defined easement area, and has the right to lay additional lines under the easements. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

77. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 1480-52-9610 by virtue of the following recorded instruments: Right of Way Agreement dated October 26, 1949, recorded in Deed Book 307, at Page 350, in the Clerk's Office of the Circuit Court of Pittsylvania County; Right of Way Agreement

dated November 23, 1949, recorded in Deed Book 307, at Page 348, in the Clerk's Office of the Circuit Court of Pittsylvania County; Right of Way Agreement dated August 13, 1951, recorded in Deed Book 330, at Page 542, in the Clerk's Office of the Circuit Court of Pittsylvania County; and Amendment to Right of Way Agreement dated September 28, 1987, recorded in Deed Book 824, at Page 597, in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the defined easement area, and has the right to lay additional lines under the easements. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

78. Transco has insufficient information to admit or deny the allegations in Paragraph 78 and therefore those allegations are denied

79. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 1480-31-7313 by virtue of the following recorded instruments: Right of Way Agreement dated October 25, 1949, recorded in Deed Book 307, at Page 72, in the Clerk's Office of the Circuit Court of Pittsylvania County; and Option to Purchase Supplemental Easement and Right-of-Way dated June 11, 2018, bearing Instrument No. 18-03592 recorded in the Clerk's Office of the Circuit Court of Pittsylvania County.

Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the easement area, and has the right to lay additional lines under the easement. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

80. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 1389-39-0919 by virtue of that certain Right of Way Agreement dated October 3, 1949, recorded in Deed Book 307, at Page 70, in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the easement area, and has the right to lay additional lines under the easement. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

81. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 1389-28-9979 by virtue of that certain Right of Way Agreement dated October 3, 1949, recorded in Deed Book 307, at Page 70, in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the easement area, and has the right to lay additional lines under the easement. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

82. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 1389-27-6997 by virtue of that certain Right of Way Agreement dated September 22, 1949, recorded in Deed Book 305, at Page 274, in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the easement area, and has the right to lay additional lines under the easement. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order

and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

83. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 1389-18-4204 by virtue of that certain Right of Way Agreement dated September 23, 1949, recorded in Deed Book 305, at Page 272, in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the easement area, and has the right to lay additional lines under the easement. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

84. Transco has insufficient information to admit or deny the allegations in Paragraph 84 and therefore those allegations are denied.

85. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 1379-93-3906 by virtue of that certain Right of Way Agreement dated November 22, 1949, recorded in Deed Book 207, at Page 419, in the Clerk's Office of the Circuit Court of Pittsylvania County, and Option to Purchase Supplemental Easement and Right-of-Way dated June 20, 2018, bearing Instrument No. 18-03589 recorded in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates

and maintains natural gas pipelines and appurtenant facilities within the easement area, and has the right to lay additional lines under the defined easement. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

86. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 1379-62-3464 by virtue of that certain Right of Way and River Crossing Agreement dated September 19, 1949, recorded in Deed Book 305, at Page 266, in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the easement area, and has the right to lay additional lines under the easement. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

87. Transco has insufficient information to admit or deny the allegations in Paragraph 87.

88. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 1379-60-0629 by virtue of that certain Right of Way Agreement dated September 15, 1949, recorded in Deed Book 305, at Page 265, in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the easement area, and has the right to lay additional lines under the easement. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

89. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 1379-70-6742 by virtue of that certain Right of Way Agreement dated September 20, 1949, recorded in Deed Book 305, at Page 263, in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the easement area, and has the right to lay additional lines under the easement. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order

and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

90. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 1378-58-6247 by virtue of that certain Right of Way Agreement dated September 14, 1949, recorded in Deed Book 305, at Page 262, in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the easement area, and has the right to lay additional lines under the easement. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

91. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 1378-38-8721 by virtue of that certain Right of Way Agreement dated September 16, 1949, recorded in Deed Book 305, at Page 260, in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the easement area, and has the right to lay additional lines under the easement. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive

Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

92. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 1378-48-4107 by virtue of that certain Right of Way Agreement dated September 14, 1949, recorded in Deed Book 305, at Page 262, in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the easement area, and has the right to lay additional lines under the easement. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

93. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 1378-37-1447 by virtue of that certain Right of Way Agreement dated September 14, 1949, recorded in Deed Book 305, at Page 259, in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the easement area, and has the right to lay additional lines under the easement. In addition to the objections and defenses listed

below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

94. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 1378-36-7998 by virtue of that certain Right of Way Agreement dated September 14, 1949, recorded in Deed Book 305, at Page 259, in the Clerk's Office of the Circuit Court of Pittsylvania County, under which Transco has the right to lay additional pipelines within the easement area. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking to the extent it will materially impair and substantially interfere with Transco's prior public use or deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

95. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 1378-37-0071 by virtue of that certain Right of Way Agreement dated September 14, 1949, recorded in Deed Book 305, at Page 259, in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the easement area, and has the right to

lay additional lines under the easement. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

96. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 1378-36-2532 by virtue of that certain Right of Way Agreement dated September 14, 1949, recorded in Deed Book 305, at Page 259, in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the easement area, and has the right to lay additional lines under the easement. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

97. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 1378-26-4426 by virtue of that certain Right of Way Agreement dated September 14, 1949, recorded in Deed Book 305, at Page 259, in the Clerk's Office of the

Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the easement area, and has the right to lay additional lines under the easement. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

98. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 1378-26-3310 by virtue of that certain Right of Way Agreement dated September 14, 1949, recorded in Deed Book 305, at Page 259, in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the easement area, and has the right to lay additional lines under the easement. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

99. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 1378-26-2169 by virtue of that certain Right of Way Agreement dated September 14, 1949, recorded in Deed Book 305, at Page 259, in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the easement area, and has the right to lay additional lines under the easement. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

100. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 1378-26-2009 by virtue of that certain Right of Way Agreement dated September 14, 1949, recorded in Deed Book 305, at Page 259, in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the easement area, and has the right to lay additional lines under the easement. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order

and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

101. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 1378-16-7258 by virtue of that certain Right of Way Agreement dated September 14, 1949, recorded in Deed Book 305, at Page 259, in the Clerk's Office of the Circuit Court of Pittsylvania County, under which Transco has the right lay additional pipelines within the easement area. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking to the extent it will materially impair and substantially interfere with Transco's prior public use or deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

102. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 1378-25-1939 by virtue of that certain Right of Way Agreement dated September 14, 1949, recorded in Deed Book 305, at Page 259, in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the easement area, and has the right to lay additional lines under the easement. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further

objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

103. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 1378-15-3612 by virtue of that certain Right of Way Agreement dated September 14, 1949, recorded in Deed Book 305, at Page 259, in the Clerk's Office of the Circuit Court of Pittsylvania County, as amended by Amendment to Right of Way Agreement dated November 29, 1973, recorded in Deed Book 581, at Page 660, in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the defined easement area, and has the right to lay additional lines under the easement. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

104. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 1378-15-4835 by virtue of that certain Right of Way Agreement dated September 14, 1949, recorded in Deed Book 305, at Page 259, in the Clerk's Office of the Circuit Court of Pittsylvania County, as amended by Amendment to Right of Way Agreement dated November 29, 1973, recorded in Deed Book 581, at Page 660, in the

Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the defined easement area, and has the right to lay additional lines under the easement. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

105. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 1378-15-1061 by virtue of the following recorded instruments: Right of Way Agreement dated October 13, 1949, recorded in Deed Book 305, at Page 401, in the Clerk's Office of the Circuit Court of Pittsylvania County; and Right of Way Agreement dated September 9, 1949, recorded in Deed Book 305, at Page 257, in the Clerk's Office of the Circuit Court of Pittsylvania County, as amended by Amendment to Right of Way Agreement dated February 19, 1970, recorded in Deed Book 523, at Page 262, in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the defined easement area, and has the right to lay additional lines under the easements. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing

easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

106. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 1378-14-3208 by virtue of that certain Right of Way Agreement dated September 9, 1949, recorded in Deed Book 305, at Page 257, in the Clerk's Office of the Circuit Court of Pittsylvania County, as amended by Amendment to Right of Way Agreement dated February 19, 1970, recorded in Deed Book 523, at Page 262, in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the defined easement area, and has the right to lay additional lines under the easement. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

107. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 1378-04-7195 by virtue of that certain Right of Way Agreement dated February 23, 1950, recorded in Deed Book 310, at Page 466, in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the easement area, and has the right to

lay additional lines under the easement. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

108. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 1378-04-7195 by virtue of the following recorded instruments: Right of Way Agreement dated September 9, 1949, recorded in Deed Book 305, at Page 256, in the Clerk's Office of the Circuit Court of Pittsylvania County; Right of Way Agreement dated April 3, 1952, recorded in Deed Book 335, at Page 531, in the Clerk's Office of the Circuit Court of Pittsylvania County; Right of Way Agreement dated May 20, 1952 recorded in Deed Book 336, at Page 473, in the Clerk's Office of the Circuit Court of Pittsylvania County; Right of Way Agreement dated May 29, 1953, recorded in Deed Book 344, at Page 498, in the Clerk's Office of the Circuit Court of Pittsylvania County.

Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the easement area, and has the right to lay additional lines under the easement. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's

proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

109. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 1378-02-7852 by virtue of the following recorded instruments: Right of Way Agreement dated September 9, 1949, recorded in Deed Book 305, at Page 256, in the Clerk's Office of the Circuit Court of Pittsylvania County; Right of Way Agreement dated February 13, 1950, recorded in Deed Book 310, at Page 464, in the Clerk's Office of the Circuit Court of Pittsylvania County; Right of Way Agreement dated April 3, 1952, recorded in Deed Book 335, at Page 531, in the Clerk's Office of the Circuit Court of Pittsylvania County; Right of Way Agreement dated May 20, 1952, recorded in Deed Book 336, at Page 472, in the Clerk's Office of the Circuit Court of Pittsylvania County; Right of Way Agreement dated May 24, 1952, recorded in Deed Book 336, at Page 473, in the Clerk's Office of the Circuit Court of Pittsylvania County; and Right of Way Agreement dated May 29, 1953, recorded in Deed Book 344, at Page 498, in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the easement area, and has the right to lay additional lines under the easements. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its

Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

110. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 1378-02-1967 by virtue of the following recorded instruments: Right of Way Agreement dated September 9, 1949, recorded in Deed Book 305, at Page 256, in the Clerk's Office of the Circuit Court of Pittsylvania County; Right of Way Agreement dated February 13, 1950, recorded in Deed Book 310, at Page 464, in the Clerk's Office of the Circuit Court of Pittsylvania County; Right of Way Agreement dated April 3, 1952, recorded in Deed Book 335, at Page 531, in the Clerk's Office of the Circuit Court of Pittsylvania County; Right of Way Agreement dated May 20, 1952, recorded in Deed Book 336, at Page 472, in the Clerk's Office of the Circuit Court of Pittsylvania County; Right of Way Agreement dated May 24, 1952, recorded in Deed Book 336, at Page 473, in the Clerk's Office of the Circuit Court of Pittsylvania County; and Right of Way Agreement dated May 29, 1953, recorded in Deed Book 344, at Page 498, in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the easement area, and has the right to lay additional lines under the easements. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its

Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

111. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 1368-92-9576 by virtue of the following recorded instruments: Right of Way Agreement dated September 9, 1949, recorded in Deed Book 305, at Page 255, in the Clerk's Office of the Circuit Court of Pittsylvania County; and Right of Way Agreement dated January 27, 1951, recorded in Deed Book 329, at Page 559, in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the easement area, and has the right to lay additional lines under the easements. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

112. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 1368-92-7344 by virtue of the following recorded instruments: Right of Way Agreement dated September 9, 1949, recorded in Deed Book 305, at Page 255, in the Clerk's Office of the Circuit Court of Pittsylvania County; and Right of Way Agreement dated January 27, 1951, recorded in Deed Book 329, at Page 559, in the Clerk's Office of the Circuit Court of Pittsylvania County, under which Transco has the right to lay

additional pipelines within the easement area. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking to the extent it will materially impair and substantially interfere with Transco's prior public use or deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

113. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 1368-81-1016 by virtue of the following recorded instruments: Right of Way Agreement dated September 14, 1949, recorded in Deed Book 306, at Page 591, in the Clerk's Office of the Circuit Court of Pittsylvania County; Right of Way Agreement dated November 2, 1949, recorded in Deed Book 306, at Page 590, in the Clerk's Office of the Circuit Court of Pittsylvania County; and Right of Way Agreement dated October 4, 1950, recorded in Deed Book 327, at Page 390, in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the easement area, and has the right to lay additional lines under the easements. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order

and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

114. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 1368-80-0248 by virtue of the following recorded instruments: Right of Way Agreement dated November 2, 1949, recorded in Deed Book 307, at Page 346, in the Clerk's Office of the Circuit Court of Pittsylvania County, and Right of Way Agreement dated November 12, 1949, recorded in Deed Book 307, at Page 344, in the Clerk's Office of the Circuit Court of Pittsylvania County, both as amended by Supplemental Right of Way Agreement dated March 2, 1960, recorded in Deed Book 277, at Page 37, in the Clerk's Office of the Circuit Court of Pittsylvania County; and Right of Way Agreement dated April 12, 1966, recorded in Deed Book 469, at Page 254, in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the defined easement area, and has the right to lay additional lines under the easements. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

115. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 1367-69-8712 by virtue of that certain Right of Way Agreement dated

November 2, 1949, recorded in Deed Book 306, at Page 588, in the Clerk's Office of the Circuit Court of Pittsylvania County, as amended by Amendment to Right of Way Agreement dated April 20, 1966, recorded in Deed Book 469, at Page 547, in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the defined easement area, and has the right to lay additional lines under the easements. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

116. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 1367-68-5019 by virtue of that certain Right of Way Agreement dated March 1, 1950, recorded in Deed Book 310, at Page 454, in the Clerk's Office of the Circuit Court of Pittsylvania County, as amended by Amendment to Right of Way Agreement dated April 12, 1966, recorded in Deed Book 469, at Page 275, in the Clerk's Office of the Circuit Court of Pittsylvania County, and by Supplemental Right of Way Agreement dated August 18, 1958, recorded in Deed Book 384, at Page 104, in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the defined easement area, and has the right to lay additional lines under the easement. In addition to the objections

and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

117. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 1367-48-6058 by virtue of that certain Right of Way Agreement dated September 14, 1949, recorded in Deed Book 305, at Page 254, in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the easement area, and has the right to lay additional lines under the easement. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

118. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 1367-65-4960 by virtue of that certain Right of Way Agreement dated September 14, 1949, recorded in Deed Book 305, at Page 254, in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural

gas pipelines and appurtenant facilities within the easement area, and has the right to lay additional lines under the easement. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

119. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 1367-45-6386 by virtue of that certain Right of Way Agreement dated September 8, 1949, recorded in Deed Book 305, at Page 252, in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the easement area, and has the right to lay additional lines under the easement. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

120. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 1367-45-5455 by virtue of that certain Right of Way Agreement dated

September 8, 1949, recorded in Deed Book 305, at Page 252, in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the easement area, and has the right to lay additional lines under the easement. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

121. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 1367-45-2671 by virtue of that certain Right of Way Agreement dated November 1, 1949, recorded in Deed Book 306, at Page 587, in the Clerk's Office of the Circuit Court of Pittsylvania County, as amendment by Amendment to Right of Way Agreement dated May 5, 1966, recorded in Deed Book 470, at Page 232, in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the defined easement area, and has the right to lay additional lines under the easement. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of

its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

122. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 1367-34-4497 by virtue of that certain Right of Way Agreement dated November 1, 1949, recorded in Deed Book 306, at Page 587, in the Clerk's Office of the Circuit Court of Pittsylvania County, as amendment by Amendment to Right of Way Agreement dated May 5, 1966, recorded in Deed Book 470, at Page 232, in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the defined easement area, and has the right to lay additional lines under the easement. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

123. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 1367-41-6185 by virtue of the following recorded instruments: Right of Way Agreement dated September 21, 1949, recorded in Deed Book 306, at Page 49, in the Clerk's Office of the Circuit Court of Pittsylvania County; Right of Way Agreement dated September 9, 1949, recorded in Deed Book 305, at Page 251, in the Clerk's Office of the Circuit Court of Pittsylvania County; Right of Way Agreement dated November

12, 1949, recorded in Deed Book 306, at Page 585, in the Clerk's Office of the Circuit Court of Pittsylvania County; and Right of Way Agreement dated September 21, 1949, recorded in Deed Book 306, at Page 47, in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the easement area, and has the right to lay additional lines under the easements. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

124. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 1367-41-6185 by virtue of the following recorded instruments: Right of Way Agreement dated September 21, 1949, recorded in Deed Book 306, at Page 49, in the Clerk's Office of the Circuit Court of Pittsylvania County; Right of Way Agreement dated September 9, 1949, recorded in Deed Book 305, at Page 251, in the Clerk's Office of the Circuit Court of Pittsylvania County; Right of Way Agreement dated November 12, 1949, recorded in Deed Book 306, at Page 585, in the Clerk's Office of the Circuit Court of Pittsylvania County; and Right of Way Agreement dated September 21, 1949, recorded in Deed Book 306, at Page 47, in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines

and appurtenant facilities within the easement area, and has the right to lay additional lines under the easements. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

125. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 1367-41-6185 by virtue of the following recorded instruments: Right of Way Agreement dated September 21, 1949, recorded in Deed Book 306, at Page 49, in the Clerk's Office of the Circuit Court of Pittsylvania County; Right of Way Agreement dated September 9, 1949, recorded in Deed Book 305, at Page 251, in the Clerk's Office of the Circuit Court of Pittsylvania County; Right of Way Agreement dated November 12, 1949, recorded in Deed Book 306, at Page 585, in the Clerk's Office of the Circuit Court of Pittsylvania County; and Right of Way Agreement dated September 21, 1949, recorded in Deed Book 306, at Page 47, in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the easement area, and has the right to lay additional lines under the easements. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the

use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

126. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 1367-41-6185 by virtue of the following recorded instruments: Right of Way Agreement dated September 21, 1949, recorded in Deed Book 306, at Page 49, in the Clerk's Office of the Circuit Court of Pittsylvania County; Right of Way Agreement dated September 9, 1949, recorded in Deed Book 305, at Page 251, in the Clerk's Office of the Circuit Court of Pittsylvania County; Right of Way Agreement dated November 12, 1949, recorded in Deed Book 306, at Page 585, in the Clerk's Office of the Circuit Court of Pittsylvania County; and Right of Way Agreement dated September 21, 1949, recorded in Deed Book 306, at Page 47, in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the easement area, and has the right to lay additional lines under the easements. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

127. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 1356-75-0037 by virtue of the following recorded instruments: Right of Way Agreement dated September 21, 1949, recorded in Deed Book 306, at Page 47, in the Clerk's Office of the Circuit Court of Pittsylvania County; and Right of Way Agreement dated September 21, 1949, recorded in Deed Book 306, at Page 49, in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the easement area, and has the right to lay additional lines under the easements. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

128. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 1356-31-0719 by virtue of that certain Right of Way Agreement dated December 29, 1949, recorded in Deed Book 312, at Page 308, in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the defined easement area, and has the right to lay additional lines under the easement. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will

deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

129. Transco admits it owns an interest in Pittsylvania County, Virginia Tax Map Parcel 1356-31-0719 by virtue of that certain Right of Way Agreement dated December 29, 1949, recorded in Deed Book 312, at Page 308, in the Clerk's Office of the Circuit Court of Pittsylvania County. Transco currently operates and maintains natural gas pipelines and appurtenant facilities within the defined easement area, and has the right to lay additional lines under the easement. In addition to the objections and defenses listed below, Transco objects to MVP's proposed taking on the grounds it will materially impair and substantially interfere with Transco's prior public use and will deprive Transco of the use and enjoyment of its pre-existing easement rights. Transco further objects to MVP's proposed taking because it exceeds the scope of its Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of its proposed pipeline.

130. Transco has insufficient information to admit or deny the allegations in Paragraph 130 and therefore those allegations are denied.

131. Transco admits the allegations in Paragraph 131.

132. Transco admits the FERC issued the Certificate Order, which speaks for itself and must be read as a whole.

133. Transco has insufficient information to admit or deny the allegations in Paragraph 133 and therefore those allegations are denied.

134. Transco has insufficient information to admit or deny the allegations in Paragraph 134 and therefore those allegations are denied.

135. Transco has insufficient information to admit or deny the allegations in Paragraph 135 and therefore those allegations are denied.

136. Transco admits Section 7(h) of the Natural Gas Act grants MVP, as holder of a certificate of public convenience and necessity, the general right of eminent domain to acquire necessary rights-of-way to construct, operate, and maintain a pipe line for the transportation of natural gas. Transco denies MVP may exercise such rights to acquire Transco's pre-existing easement rights, or to materially impair and substantially interfere with Transco's prior public uses.

137. With regard to Transco's property rights and interests sought to be acquired by MVP, Transco denies the allegations in Paragraph 137. MVP's proposed taking exceeds the scope of the Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of the pipeline, materially impairs and substantially interferes with Transco's prior public uses, and deprives Transco of its use and enjoyment of its pre-existing easement rights.

138. With regard to Transco's property rights and interests sought to be acquired by MVP, Transco denies the allegations in Paragraph 138. MVP's proposed taking exceeds the scope of the Certificate Order and that which is reasonable and necessary for the construction, operation and maintenance of the pipeline, materially

impairs and substantially interferes with Transco's prior public uses, and deprives Transco of its use and enjoyment of its pre-existing easement rights.

139. Transco denies the allegation in Paragraph 139.

#### **OBJECTIONS AND DEFENSES**

By pleading the following objections and defenses, Transco does not concede that each of the matters covered by the numbered defenses must be proven by Transco. Transco reserves the position that Plaintiff retains the burden of proof on all matters necessary to state the claims asserted in the Complaint.

1. Plaintiff's proposed taking is barred by the prior public use doctrine.
2. Plaintiff's proposed taking exceeds the scope of its Certificate Order.
3. Plaintiff's proposed taking exceeds what is reasonable and necessary for the construction, operation and maintenance of its pipeline.
4. Plaintiff's proposed route and location constitutes an abuse of discretion.
5. All or a portion of Plaintiff's claims are barred by the express agreement between the parties.
6. Plaintiff failed to negotiate in good faith.
7. Should this Court determine MVP's proposed takings are permissible, Transco demands a jury trial to determine the just compensation owed to it by MVP for the proposed taking.
8. Transco reserve the right to amend this Answer and to assert additional affirmative defenses supported by facts obtained in discovery.

#### **RELIEF REQUESTED**

Transco requests the Court deny MVP the requested property rights and easements sought to be acquired from Transco, that judgment be entered in favor of Transco and against MVP, and that Transco recover its costs, attorneys' fees, and all such other relief to which it may be entitled. In the alternative, if the Court determines MVP may acquire all or some of the rights sought in its Complaint, Transco demands a trial by jury to determine the just compensation for the takings.

TRANSCONTINENTAL GAS  
PIPE LINE COMPANY, LLC

By Counsel

Counsel:

/s/ Glenn W. Pulley

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 15th day of March, 2021, a true and correct copy of the foregoing was filed with the Clerk of Court using the CM/ECF system, which provided electronic service to all counsel of record.

/s/ Glenn W. Pulley